

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

TRISTAN SCHULTIS, M.D.)	CIVIL ACTION
)	
Vs.)	Case No. 1:08CV00083LMB
)	
ADVANCED HEALTH CARE)	JURY TRIAL DEMANDED
MANAGEMENT SERVICES, LLC)	
)	

**ANSWER TO AMENDED AND SUPPLEMENTAL COMPLAINT FOR
DECLARATORY JUDGMENT, DAMAGES AND OTHER EQUITABLE RELIEF**

Defendant Advanced Health Care Management Services, LLC (“AHCMS” or “Defendant”, by and through its attorneys, Hackworth, Hackworth & Ferguson, LLC hereby provides its Answer to Amended and Supplemental Complaint for Declaratory Judgment, Damages and Other Equitable Relief of Tristan Schultis, M.D. (“Schultis” or “Plaintiff”), and for such, states as follows:

1. Defendant incorporates by reference herein each and every allegation contained in Defendant’s Answer and Affirmative Defenses previously filed herein.

2. Defendant denies the allegations set forth in paragraph two (2) of Plaintiff’s Amended and Supplemental Complaint for Declaratory Judgment, Damages and Other Equitable Relief.

3. Defendant denies the allegations set forth in paragraph three (3) of Plaintiff’s Amended and Supplemental Complaint for Declaratory Judgment, Damages and other Equitable Relief.

4. Defendant restates as if written out fully and in extenso all of the allegations of fact set forth in Defendant’s Counterclaim to the original complaint.

WHEREFORE, Defendant, Advanced Health Care Management Services, LLC, respectfully requests that this Court dismiss with prejudice the Plaintiff's Amended and Supplemental Complaint for Declaratory Judgment, Damages and other Equitable Relief, or in the alternative, enter judgment in favor of the Defendant and against Plaintiff, that Defendant be awarded its costs and attorney's fees in this action, and for such other and further relief as this court deems just and proper.

HACKWORTH, HACKWORTH & FERGUSON LLC

By: /s/ Joy J. Ferguson
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LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served upon the following counsel via email transmission 22nd day of December, 2010.

Henry L. Klein
Attorney At Law
844 Baronne Street
New Orleans, LA 70113

/s/ Joy J. Ferguson